

From: Seidman, Bruce A. [<mailto:BASeidman@MDWCG.com>]
Sent: Thursday, January 7, 2016 2:10 PM
To: Michael Buckley <mbuckley@buckleylawgroup.com>
Subject: RE: Siguencia

Michael: I spoke with Paul Kayata, the Liberty Mutual claims professional. He advises that Liberty Mutual incurred \$146,736.00 in defending Gilbane. He advises that Valiant has represented it incurred \$63,901.68 to defend DASNY. LM is willing to pay 50% of the costs to Valiant for DASNY's defense. Deducting 50% of the \$63,901.68 (\$31,950.84) from the \$146,736.00 owed to LM, LM is seeking \$114,785.16 from Valiant. Bruce



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From: Michael Buckley [<mailto:mbuckley@buckleylawgroup.com>]
Sent: Tuesday, January 05, 2016 11:04 AM
To: Seidman, Bruce A.
Cc: Helene Dalmanieras; Natesha Salley
Subject: RE: Siguencia

Hi Bruce: on a phone depo. Will try to get with them as soon as done and will send another email. Is it possible for you get me actual numbers that your client is demanding for fee reimbursement? That may get their attention better.



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From: Seidman, Bruce A. [<mailto:BASeidman@MDWCG.com>]
Sent: Tuesday, January 05, 2016 10:43 AM
To: Michael Buckley <mbuckley@buckleylawgroup.com>
Subject: RE: Siguencia

Michael: I hope you had a great holiday and New Year experience. I would like to try and resolve the counsel fee issue. Please call with your offer. Thanks. Bruce

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From: Michael Buckley [<mailto:mbuckley@buckleylawgroup.com>]
Sent: Friday, December 18, 2015 2:50 PM
To: Seidman, Bruce A.
Subject: RE: Siguencia

I am so sorry. I will call the adjuster's supervisor on Monday.



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From: Seidman, Bruce A. [<mailto:BASeidman@MDWCG.com>]

Sent: Friday, December 18, 2015 1:17 PM

To: Michael Buckley <mbuckley@buckleylawgroup.com>

Subject: RE: Siguencia

Michael: I write in follow up. Please let's try and get this counsel fee issue resolved. Please make an offer to start the process. Thanks. Bruce

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From: Michael Buckley [<mailto:mbuckley@buckleylawgroup.com>]

Sent: Friday, December 11, 2015 8:43 AM

To: Seidman, Bruce A.

Cc: Helene Dalmanieras

Subject: RE: Siguencia

OK; thanks for the reminder. I will call the client again.



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From: Seidman, Bruce A. [<mailto:BASeidman@MDWCG.com>]

Sent: Thursday, December 10, 2015 9:57 AM

To: Michael Buckley <mbuckley@buckleylawgroup.com>

Subject: RE: Siguencia

Michael: Please follow up and provide an offer. Thanks. Bruce

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From: Michael Buckley [<mailto:mbuckley@buckleylawgroup.com>]

Sent: Monday, November 30, 2015 7:45 PM

To: Seidman, Bruce A.

Cc: Helene Dalmanieras

Subject: RE: Siguencia

Yes; it did. Thanks you.

I am now up in beautiful Rochester with some depositions going on all week. Thanks for the reminder. I will call them again tomorrow.



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From: Seidman, Bruce A. [<mailto:BASeidman@MDWCG.com>]

Sent: Monday, November 30, 2015 11:05 AM

To: Michael Buckley <mbuckley@buckleylawgroup.com>

Subject: Siguenca

Michael: Hope your trial went well. Please get back to me with an offer on the counsel fee issue. Thanks. Bruce

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